

Exhibit 1)

Davis County Sheriff's Office
 Correctional Division
Inmate Request and Grievance Form

Four
 Just for good
 measure

Name ANGEL ABZELI Inmate # 398407 Housing Unit F-11

Date 11/19/20 Check One: ☐ Request ☒ Inmate Grievance ☐ Good Time ☐ Disciplinary Appeal ☐ Other

Describe Problem or Request: I HAVE A LEGIT ISSUE THAT IVE HAD AND HAVE BEEN HAVING WITH MEDICAL AND ONE OF THE DOCTORS. I FILED OUT A GRIEVANCE THAT WASNT TAKEN SERIOUS AND I WAS TOLD TO REWRITE THE GRIEVANCE TO MEDICAL AS A REQUEST. I WOULD LIKE TO TALK WITH JENSEN ABOUT THE GRIEVANCE I WROTE AND THE PROBLEM I AM HAVING. IF YOU WOULD PLEASE Department Use Only COME SPEAK WITH ME.

Received by [REDACTED] Date 11/19/2020 Time 1555
 Routed to: [REDACTED]

Reply: Oh yes, I am not sure if we talked about this grievance or not when I was talking to you on the morning 11-30-2020 in your cell.

Disposition by [REDACTED] Date 11-30-2020 Time 1344
 Returned to Inmate by: [REDACTED] Date 11-30-2020 Time [REDACTED]

Original - Classification File Return - Inmate response File - Inmate
 DCJ Form 501a (revised 02-29-94)

INMATE COPY

DAVIS COUNTY SHERIFF'S DEPARTMENT

Medical Inmate Request/Grievance Form

Date: _____

Inmate Name: _____ Booking #: _____ Housing: _____

Request: _____

Do Not Write Below This Line

For Official Use Only

Received By: _____ Date: _____ Time: _____

Medical/Dental Treatment Policy

In order to facilitate a request for treatment, the inmate must fill out a Medical Request Form asking for treatment. Inmate will then be assessed by a nurse. It is our policy that no one be denied medical treatment. Please refer to your inmate handbook or price list on the Kiosk for appropriate fee.

Answer: * KITE ABOUT WRISTS/HANDS
You are on the medical listDisposition by: AL Date: 10/16/20 Time: _____

Returned to inmate by: _____ Date: _____ Time: _____

Original - medical file; Yellow - inmate with response

DCJ-444

10-1-20 You GIVE ME 4 MONTHS WHEN IVE SEEN TWO OTHER INMATES BREAK A DOOR AND GET 30 DAYS IN THE HALL AND RESTRICTION. AND HOW IS IT MY GUILTY OF 9 - THATS 9! CHARGE A DOOR. AND I DON'T APPRECIATE YOUR SAYING OFFICERS LAUGHING WHEN I BRING UP IN MY HEARING. PLEASE DENY THEM **Inmate Request and Grievance Form** IS A CHARGE AND DOES NOT EVEN ON RECORD ON HERE. I DESERVE ALL THE OWES TO SPECIFICALLY LIKE TO ASK

Davis County Sheriff's Office
Correctional Division

Name ANGEL ABLE Inmate # 398403 Housing Unit F-4

Date 10/20/20 Check One: ☐ Request ☒ Inmate Grievance ☐ Good Time ☒ Disciplinary Appeal ☐ Other

Describe Problem or Request: THIS IS GETTING RIDICULOUS AND YOU CANT TELL ME I VIOLE THE RULES. I HAVE CRASHED. I AM NOT LIKE SOME 'VICTIM'S' AND IVE ADMITTED MY MISTAKES. ONLY DID I NEARLY GIVE ME A YEARS WORTH OF SANCTION TIME FROM THE INCIDENT THAT I WAS ASKED TO DO. I HAVE TO DO FOR A DOOR! IVE GOT MORE SANCTION TIME FOR ONE INCIDENT THEN MOST INMATES GET FOR DOING MORE TO TOP IT YOU BREAK ME OFF 4 MONTHS FOR A DOOR THAT I WAS CHARGED WITH 1200.00. Davis County Sheriff's Department Use Only

NO - WHICH IS NEARLY 4 MONTHS. I AM REQUESTING THIS APPEAL BE DONE IN PRISON AND YOU CAN MAKE A DECISION. I NOTED THAT YOU TOOK 2 WEEKS TO FILE MY APPEAL IN THE FIRST PLACE.

Received by: Durden Date: 10/21/20 Time: 13130

Routed to: CLASSIFICATION

Reply: You claim the disciplinary sanction imposed in your case is excessive. The sanctions imposed fall within the authorized range for the violations you have been found guilty of. The DHO has the discretion to impose sanctions within the approved range based upon the circumstances of each individual case. The findings and sanctions imposed by the DHO are sustained.

Disposition by: Sgt. Melh Date: 10/22/2020 Time: 0709Returned to Inmate by: M115 Date: 10/22-20 Time: _____

Medical Inmate Request/Grievance Form

Date: 7-1-68

Inmate Name: ANGEL ABRA

Booking #: 948903 Housing:

[illegible]

Do Not Write Below This Line.

Received By: Lewis - 17375 Date: 7-29-2020 Time: 13:45

Medical/Dental Treatment Policy

In order to facilitate a request for treatment, the inmate must fill out a Medical Request Form asking for treatment. Inmate will then be assessed by a nurse. It is our policy that no one be denied medical treatment. Please refer to your inmate handbook or price list on the Kiosk for appropriate fee.

Answer: _____

Date: _____ **Time:** _____

Disposition by: _____ Date: _____ Time: _____

Returned to inmate by: _____ Original - medical file; Yellow - inmate with response

Original - medical file; Yellow - inmate with response

DCJ-444

DAVIS COUNTY SHERIFF'S DEPARTMENT

Medical Inmate Request/Grievance Form

Date: 4/20/20Inmate Name: Angel Abreu Booking #: 398403 Housing: H-4Request: Angel Abreu is requesting a medical appointment for a physical exam.

Do Not Write Below This Line

For Official Use Only

Received By: CC Date: 4/20/20 Time: **Medical/Dental Treatment Policy**

In order to facilitate a request for treatment, the inmate must fill out a Medical Request Form asking for treatment. Inmate will then be assessed by a nurse. It is our policy that no one be denied medical treatment. Please refer to your inmate handbook or price list on the Kiosk for appropriate fee.

*delay!

Answer: Chart 1111-2011 5/11/20 - evaluated - scheduled to see the doctor next week.

Disposition by: CC Date: 5-1-20 Time: 1742Returned to inmate by: Date: Time:

Original - medical file; Yellow - inmate with response

DCJ-444

Davis County Sheriff's Office

Correctional Division

Inmate Request and Grievance FormName: ANGEL ABEU Inmate #: 398403 Housing Unit: H-4Date: 5-1-20 Check One: ☐ Request ☒ Inmate Grievance ☐ Good Time ☐ Disciplinary Appeal ☐ OtherDescribe Problem or Request: Angel Abreu is requesting a medical appointment for a physical exam.

Department Use Only

Received by: CC Date: 01 MAY 2020 Time: Routed to: OFFICIALReply: On 5/11/2020, Angel Abreu scheduled.Disposition by: CC Date: 5/3/2020 Time: 1240Returned to Inmate by: Date: Time:

Request for medical treatment. After inmate response, the inmate will be assessed by a nurse. It is our policy that no one be denied medical treatment. Please refer to your inmate handbook or price list on the Kiosk for appropriate fee.

Inmate Request and Grievance Form

Department Use Only

Original - Classification File Yellow - Inmate w/ response Pink - Inmate
DOJ Form 501a (revised 02-29-96)

Inmate Request and Grievance Form

Department Use Only

Returned to Inmate by: _____ Date: _____ Time: _____

DAVIS COUNTY JAIL
Medical/Dental

Name: ANGEL CHRISTOPHER
ABREU

Inmate ID#: 398403

Housing Unit: Q-21;DCCF;POD6;
QUEBEC

Date: 09/14/2020

Inmate Request:

09/14/2020 19:33:08

i need to see the doctor asap for my face an the infection ive been having and just seen u for. my face is worse and u didnt give me meds

Inmate Signature/Date: _____

Staff Response:

09/14/2020 20:37:17

We just sent your culture out to the lab. As soon as we get results back, you will be scheduled to see the Dr. again.

Staff Signature/Date: _____

INMATE COPY

DAVIS COUNTY JAIL
Watch Commander

Name: ANGEL CHRISTOPHER
ABREU

Inmate ID#: 398403

Date: 09/14/2020

Housing Unit: Q-21;DCCF;POD6;
QUEBEC

Inmate Request:

09/14/2020 10:31:06

im documenting once again the constant concern with my medical treatment at this facility. ive been dealing with this aggressive bumps/rash on my body for the past year and a half now and ive seen medical countless times regarding my concern for this. At first i wastold it was a rashh from working out. then i wastold its possibly staff infection. then it became staff and i almost lost my leg over it. then i was told it achne.then i was told it is stress boils. now im being told it is herpes.i went to the dr on friday 9/11/20 for this as it has spread to all over my face. and ive been told before that i need tosee a dermatologist but the jailwont let me go. now im being told its herpesand thats no joke to not help me with. ive been begging for treatment and have been denied antibiotics, creams, or any medicine to help treat or cure this. everytime i go to the dr i am told something different than last. now i was told i need a swab test done before the dr will help me or can. im curious to why im just now being told i need to swab test done after seeing the dr for a year anf s half now and about 16 times. i was toldthat all the medicinei was given before was for nothing as theres no real way totell what is wrong without running test. so the doctors have been playing guessing games and now im told i have herpes? thats nothing to play aguess game with and im demanding proper treatment and medicine as i have been for 2years now almost. if i need to see a dermatologist then i wantto go see one. i need help and ive been asking for it soplease help me figure this out. i caught this in here too so id expect some type of treatment. but im tired of seeing mdical ad not being treated or given and medicine to help me

Inmate Signature/Date: _____

Staff Response:

09/15/2020 3:46:10

A copy of this grievance has been given to medical

Staff Signature/Date: _____

INMATE COPY

~~STAFF~~ INFECTION AGAIN

DAVIS COUNTY JAIL
Medical/Dental

**Name: ANGEL CHRISTOPHER
ABREU**

Inmate ID#: 398403

Date: 09/25/2020

**Housing Unit: Q-21;DCCF;POD6;
QUEBEC**

Inmate Request:

09/25/2020 16:43:08

what is taking so long for my appointment to get set for my crown to be placed on the tooth i just had a root canal on. its been over a month since my visit, almost two, and now my tooth broke a little for not having a crown. why do yall make it such a issue for me to get the proper treatment i need. please get this done. if its not a problem with my health and dealing with getting help from you with that then its a problem with dental and getting the care i need for that. ive been here for 2 years and im close to falling apart from the lack of proper treatment. im not trying to be disrespcetful but you gotta understand my frusturation consdering all the issues ive had with your medical department. please come talk to me so we can get this done before i need dentures at 24 years old

Inmate Signature/Date: _____

Staff Response:

09/30/2020 14:59:40

Your insurance requires a waiting period for further payment. In December, your insurance will pay 50% and you will need to pay the other \$341.50. To have it done before that, the total cost to you would be \$683.00 as there would be no payment from insurance.

Also, please realize that this is all contingent upon approval for transport out of the facility for what is considered an elective procedure.

Staff Signature/Date: _____

INMATE COPY

ASK Admin Reports

10/1/2019

11:48 AM

Davis County
Print Message Report
From 1/1/1900 To 10/1/2019

Case #: 286932

Inmate: ABREU, ANGEL

Recipient: Admin, System

Cellblock: ROMEO 23 L

ID: 201807849

Created: 9/13/2019 11:29 AM

Type: Grievance

Category: Watch Commander Grievance

Sub-Category:

Status: Closed, Unfounded

From	To	Message	Entered
ABREU, ANGEL	Admin, System	look I need to speak with a captain or someone with the proper rank. your dentist wont help me because of his lack of social and emotional intelligence. hes inadequate and is denying me the help and medicine I need for my dental and medical concerns. I reached out with my health and dental issues Im aware of and asked for help in pointing me the right directions to recieve treatment I need. instead I was kicked out of the dental room without any of my questions answered or my antibiotics for a life threatening infection hes aware of. Im now being denied any report of my visit and I need to speak to a captain about the details of this visit and my treatment going forward.	9/13/2019 11:29:00 AM
Olsen,	Swaner,	Can you address this situation?	9/14/2019 6:58:00 AM
Administrator, System	ABREU, ANGEL	Case closed by System due to no activity.	9/21/2019 6:59:00 AM

ComponentOne Q1Pdf (Evaluation Version)

ME IM WRONG. ON THIS VISIT HE ACTUALLY RAISED HIS VOICE AT ME AND THAT CAUSED ME TO WALK OUT THE EXAM ROOM. IT WAS MADE VERY CLEAR IN JUST SEPTEMBER AND MANY OTHER TIMES THAT WHAT I HAVE IS STAPH. A DIFFERENT DOCTOR PERFORMED A CULTURE TEST. AFTER 2 YEARS OF CONSTANT VISITS AND MY LEG ALMOST HAD TO GET CUT OFF BECAUSE OF THIS INFECTION. BEFORE THAT DR. WOODS KEPT SAYING MY LEG WAS SWELLING FROM WORKING OUT. I WENT TODAY FOR IV ANTIBIOTICS UNTIL INFECTION WAS BACK AGAIN. AND DR. WOODS GOT MAD SAYING WHAT I HAD

Davis County Sheriff's Office

Correctional Division

Inmate Request and Grievance Form

Name ANDREW ABREU Inmate # 308403 Housing Unit F-11
 Date 11/16/20 Check One: ☐ Request ☒ Inmate Grievance ☐ Good Time ☐ Disciplinary Appeal ☐ Other
 I HAVE BEEN GOING TO MEDICAL AND WAITING LINES FOR TWO YEARS NOW

Describe Problem or Request: CONCERNING STAPH INFECTION WHICH IVE HAD DURING BACK TWO YEARS AGO FROM BEING IN
VE JAIL. IVE SEEN THE DOCTOR MANY TIMES FOR THIS AND HE/ SHE DO NOTHING OR GIVE ME AMITRIPTILINE WHICH CAN GET
DO IT FOR A LITTLE THEN IT COMES BACK. ITS BEEN MADE CLEAR THAT I NEED TO SEE A DERMATOLOGIST, YET IVE WAITED
AT ME OR HELP ME. I HAD A APPT. W/ DR. WOODS AND LIKE MANY TIMES BEFORE HE ACTS LIKE ITS HIS FIRST TIME SEEING
ME FOR THE INFECTION AND MISDIAGNOSES ME. EVERY TIME TRY TO EXPLAIN TO HIM PART VISITS OR HOW IVE HAD
THE INFECTION FOR TWO YEARS NOW HE GETS Department Use Only MAD LIKE HE DID ON TODAY'S VISIT AND TELLS

Received by [REDACTED] Date 11/18/2020 Time 15:17

Routed to: WEEKLY COMMANDER

Reply: This is a Medical request. You need to put
IT on a Medical Request Form. You can get one
from the nurse at Med Lab 5

Disposition by: [REDACTED] Date 11-19-20 Time 01:47
 Returned to Inmate by: [REDACTED] Date 11-19/20 Time 1440

Original - Classification File Yellow - Inmate Grievance Pink - Inmate
 DCJ Form 301a (revised 02-29-96)

INMATE COPY

CLAIM FOUR

I. PLAINTIFFS

Plaintiff Angel Abreu, is and at all times mentioned herein a pretrial detainee of the DAVIS COUNTY CORRECTIONAL FACILITY. Abreu is currently confined at DAVIS COUNTY CORRECTIONAL FACILITY.

II. DEFENDANTS

Defendants are Cole Maddam, Sgt. Maddam, K. Baer, E. Sullivan, Z. Jolley, and J. Schaefer individually and in their official capacity. At all times mentioned in this Complaint under the color of law. (Please refer to "THE PARTIES TO THE COMPLAINT" for details on defendants.

III. VIOLATIONS

1. US Const. art. AMENDMENTS 3 Amendment I
2. US Const. art. AMENDMENTS 3 Amendment IV
3. US Const. art. AMENDMENTS 3 Amendment VI
4. US Const. art. AMENDMENTS 3 Amendment VIII
5. US Const. art. AMENDMENTS 3 Amendment X
6. US Const. art. AMENDMENTS 3 Amendment XI
7. US Const. art. AMENDMENTS 3 Amendment XII
8. US Const. art. AMENDMENTS 3 Amendment XIII
9. US Const. art. AMENDMENTS 3 Amendment XIV
10. US Const. art. AMENDMENTS 3 Amendment XV
11. US Const. art. AMENDMENTS 3 Amendment XVI
12. US Const. art. AMENDMENTS 3 Amendment XVII
13. US Const. art. AMENDMENTS 3 Amendment XVIII
14. US Const. art. AMENDMENTS 3 Amendment XIX
15. US Const. art. AMENDMENTS 3 Amendment XX
16. US Const. art. AMENDMENTS 3 Amendment XXI
17. US Const. art. AMENDMENTS 3 Amendment XXII
18. US Const. art. AMENDMENTS 3 Amendment XXIII
19. US Const. art. AMENDMENTS 3 Amendment XXIV
20. US Const. art. AMENDMENTS 3 Amendment XXV
21. US Const. art. AMENDMENTS 3 Amendment XXVI
22. US Const. art. AMENDMENTS 3 Amendment XXVII
23. US Const. art. AMENDMENTS 3 Amendment XXVIII
24. US Const. art. AMENDMENTS 3 Amendment XXIX
25. US Const. art. AMENDMENTS 3 Amendment XXX

IV. FACTS

1. On September 26, 2020, at or around 0900 hours Z. Jolley told the plaintiff to meet him at the table so he could go through it and read legal mail. This was on a Saturday which was not, or never has been, a day mail gets delivered to the inmate. After Z. Jolley did rounds in the Quebec Housing Unit the plaintiff met him at a table in the Unit. Z. Jolley was carrying two manilla envelopes and began searching one of the two envelopes and its contents. Z. Jolley read and searched the legal mail contents page by page. Z. Jolley got to two pages that were stuck together and asked the plaintiff "what's this?" then put the contents back together and walked out the Unit with the other manilla legal mail envelope that was unopened. Never was any contraband shown or discovered in the search involving the plaintiff (Ref. to Exhibit C and I). Later officers

IN FACTS (PAGE 2)

claimed to of found contraband in the legal mail but never showed cause to search the mail nor showed cause to deliver the mail with obvious intentions to serve it on a Saturday which isn't a day mail is delivered to inmates and outside of normal operating procedure. Only one legal mail document was opened in front of the plaintiff and only a third of it was searched in front of the plaintiff. The rest of that document as well as the other unopened legal mail document was taken and searched outside of the plaintiff's presence. And the alleged contraband being found was not mentioned until first by Officer Turrell at the hospital when he told the plaintiff he believed Abreu was going to sneak drugs into the facility (Ref Exhibit C page 7). The exact charges weren't delivered to the plaintiff until 9/30/20 and CLAIM ONE is a result of this incident. Never was the plaintiff given inventory of the property searched and seized by Z. Jolly. Z. is a result of Z. Jolly's actions and allegations the plaintiff was to move from Pod 6 Quebec Housing Unit to Pod 2 Fox Housing Unit as explained in CLAIM ONE paragraphs 1-34 which the plaintiff recites and incorporates. On 9/26/20 after 1920 hours deputy Sullivan searched and seized the plaintiff's property from Quebec cell 21 which was where Abreu was housed. The list of property can be viewed at Exhibit C page 2 and 3. 13 books that included legal books on Criminal Code, Rules of Evidence, etc., 3 large yellow envelopes marked "legal mail" with several legal documents, 2 manilla folders with legal documents, 4 composition notebooks with legal notes, and several large stacks of papers from court proceedings, Utah laws and other legal documents was all searched and seized from the plaintiff that belonged to Abreu and was personally read by Sullivan considering his details on the property and the incident with Z. Jolly that happened in the

11. Facts (Page 3)

0900 hours that same day. Later was the plaintiff gives a inventory list of his property that was searched and seized and no search warrants were given to the plaintiff by Sullivan or Zeffel and the property Sullivan took was also used for the Lammington Police Department's investigation as mentioned in CLAIM one. Also common sense items, size 11 Reebok shoes, a religious (Islam) necklace and black with gold Versace prescription glasses are missing from Sullivan's report and the plaintiff did own these missing items. And the pillow Sullivan discarded was later proven to belong to the plaintiff from a receipt Abner kept. It is also important to note that the plaintiff was scheduled for court on 9/29/20 for a bail hearing and the oral argument for his evidentiary hearing regarding his criminal charges and neither rulings by the Judge that day were in favor of Abner as he was not prepared or equipped with his needed legal work which fears of research was injected into and was caused by the defendants. The oral argument was the last of almost a year worth of court proceedings regarding the evidentiary hearing. And the plaintiff had nothing from the past year or any legal documents, books, papers, notes, mail or anything for his defense whatsoever because of this improper search and seizure prejudging such done solely by the defendant causing interference when the plaintiff was trying to pursue legal actions.

23. And when the plaintiff expressed his need and the importance of his legal property (REF Exhibit I) and the rest of his property via governance Abner wrote PRISON to 9/29/20, it was answered in person by Sgt. Baer who is in the Pod 2 Fox Housing Unit at or around 0700 hours on 10/1/20. Sgt. Baer told the

11. Facts (Page 4)

plaintiff that he could have his property back once he told her that the officers didn't solve her and that another inmate stabbed him or he stabbed himself but as long as he cleared the officers from doing it then he could have his property back. Bauer mentioned that there was a lot of murky water and as long as Abreu cleaned it up he would get his stuff back. Abreu told Bauer the GRT team talked him so she walked off while refusing to give the plaintiff his property which she made clear was just sitting under her desk.

4. On 9/26/20, at around 1330 hours, J. Schow conducted the disciplinary hearing for the charges following the 9/26/20 incident with Z. Jolly and GRT members. The charges were Intentional Contact, Intimidation, Evidence Tampering, Affect Chargeable as a Crime, Resist or Obstruct Movement, Refusing a Direct Order, Creating Health/Safety Hazard and Abuse of Mail, all of which Z. Jolly charged the plaintiff with. Schow read Abreu his Miranda rights as he was facing criminal charges at the time. Abreu plead not guilty to every charge and chose not to speak further with the GRT criminal charges being a factor. Schow found the plaintiff guilty of all charges without giving any reasons for decision on the Adjudication report. One of the six sanctions imposed was "Loss of mail" which Schow imposed. During the time of the hearing the plaintiff told Schow that he wanted to defend himself against the allegations but since Miranda right were read he felt the need of a lawyer to be present so he could and Abreu asked for one but never was one given so the plaintiff could defend himself and answer questions. The plaintiff was never charged criminally because officers could not prove the plaintiff conspired with persons to introduce the contraband into the

IV. FACTS (PAGE 5)

Facility. So instead it was reported that the plaintiff was attempting to have other inmates to distract Jolley and Jolley reported that the plaintiff took possession of the legal mail form and refused to give it back unless the mail full of drugs was given to the inmate. (Ref. Exhibit I) The incident can be viewed on camera as it happened in the middle of the housing unit and none of what Jolley reported can be seen on camera nor are there any drugs. When this was mentioned to Sgt. Meldrum by the plaintiff during his disciplinary appeal, Sgt. Meldrum told the plaintiff that he does not accept new evidence after the initial disciplinary hearing. The purpose of an appeal is to consider new evidence but Sgt. Meldrum refused to do so and in doing so refused the plaintiff due process. And the legal mail form the plaintiff allegedly "refused" to give back and "took" from Jolley was a form stating that the officers searched the mail for contraband in front of the inmate before giving it to them. None of which was properly done yet Jolley made the plaintiff sign the form before he opened the mail and it was not properly searched or seized for any contraband the defendants allege were the plaintiff's. So the form was not valid and was suppose to be signed after officers search the mail not before.

5 On 10/2/20 the plaintiff filed a Disciplinary Appeal which was considered by Sgt. Meldrum who is in charge of the appeals. Please refer to "Exhibit I" for the actions of Sgt. Meldrum. The plaintiff alleges and incorporates all that is said and done in the documents referred to in "Exhibit I" for this claim. Schow took the plaintiff's mail and Sgt. Meldrum refused the plaintiff's appeal efforts and both defendants denied the plaintiff access to mail. Such was grieved multiple times by the plaintiff.

IV. FACTS (Page 2)

6. Letters along with any mail from 10/1/20 to 10/31/20 were stopped or returned without notice of explanation to either the correspondant or the recipient. And legal mail sent from the plaintiff's attorney was also sent back during this time. Mail to and from persons not incarcerated was stopped or refused on factually incorrect grounds without legitimate justification. And not once did the plaintiff receive any notice per mail that was returned. Nor was the plaintiff allowed access to law books or any books at this time.

7. Eventually Sgt. Bauer with T. Nix gave the plaintiff a portion of his property back but even on this day there is still missing items. And when Sgt. Bauer gave the portion of property back she refused to give the plaintiff his law books and his glasses saying she would only give those items if the plaintiff decided to tell her that he stabbed himself or that another inmate done it. The plaintiff once again stated the officers did it and his property was said to be put in his locker but was never given to him.

V. VIOLATION(S) SUPPORTING CLAIM

COUNT SEVEN: UNREASONABLE SEARCH AND SEIZURE

While delivering legal mail from a privileged correspondant to the plaintiff the defendant Z. Jolley did so without following daily operating procedure delivering on Saturday and failed to show cause to do so or to read the legal mail. The defendant Z. Jolley seized the legal mail claiming there was contraband inside but such finding was done so while searching the two privileged manilla envelopes and the contents away from the plaintiff after the legal mail was seized by Jolley who had obvious intentions to do so and apparent reason to believe such before the delivery was attempted to the plaintiff and without a search warrant or

V. VIOLATIONS SUPPORTING CLAIM (PAGE 2)

Issuing an inventory of the property seized nor was any notice given to the plaintiff or reason for the defendant Z. Jolly's actions and

deceitful motive. Z. Jolly's actions were deliberate decisions to deprive the plaintiff of property and caused the plaintiff to be deprived of his liberty as sanctions were imposed on the plaintiff consisting of punitive isolation, confinement to quarters, loss of classification and

loss of mail. And Jolly done so in a way that wasn't typical of prison life as mail was not and is not delivered to inmates on Saturdays or at the table in the middle of the housing unit so the officer can read and search the mail with no cause given to the plaintiff (plaintiff is working for a

GAIA request response for this incident for further understanding and evidence for this claim) by the actions of Z. Jolly committing the unreasonable search and seizure of the plaintiff's legal mail the defendant also violated the plaintiff's fourteenth Amendment procedural

Due Process and Substantive Due Process. The plaintiff alleges and incorporates paragraphs 1-7 from "IV. Facts".

COURT ELIOT: UNREASONABLE SEARCH AND SEIZURE

After being moved from the cell the plaintiff was deprived of his property as it was seized by the defendants Barr and Sullivan and searched for the investigation conducted by Farmington Police Department without a warrant or a inventory list being served to the plaintiff and the property of the plaintiff was used as a

way to get him to tell officials that either he stabbed himself or another inmate did it so the officers involved in "CLAIM ONE" would be free from accusations and guilt

The plaintiff alleges and incorporates paragraphs 1-7 from "IV. Facts"

V. VIOLATIONS) SUPPORTING CLAIM (PAGE 3)

COUNT NINE: ACCESS TO COURTS

While the plaintiff was preparing for his 9/29/20 Bail Hearing and his oral argument for his Evidentiary Hearing the legal work, notes, books, documents, prior proceedings and any legal property or discovery the plaintiff had was taken from him by the defendants Baer and Sullivan. The defendants refused to give the property back and the plaintiff was not able to further prepare for his Hearings nor did he have access to what he already had. As a result the plaintiff was not able to suppress any evidence being used against him in his Criminal Case or receive bail in any amount as the Judge did not rule in his favor. Nor was the plaintiff able to further build a defense for his Criminal Case as the property was taken from him and then used as a way to try to get the plaintiff to tell Baer that the officers from "CLAIM ONE" didn't stab him. The plaintiff realleges and incorporates paragraphs 1-7 from "iv. Facts". The plaintiff is facing Aggravated Murder, Aggravated Robbery and Aggravated Kidnapping charges since 9/29/18 and denying access to courts is very damaging to an already sensitive case.

COUNT TEN: ACCESS TO MAIL

While the defendants Schow and Sgt. Meldrum denied the plaintiff access to mail, letters along with any mail was stopped or returned without notice or explanation to either the correspondant or the recipients. The plaintiff realleges and incorporates paragraphs 1-7 from "iv. Facts".

VI. EXHAUSTION OF ADMINISTRATIVE REMEDIES

Refer to "EXHAUSTION OF ADMINISTRATIVE REMEDIES FOR ALL CLAIMS" as well as the Exhibits attached.

CLAIM FIVE (CONTINUED)

VII. CLAIMS FOR RELIEF

COUNT SEVEN

The actions of the defendants, Cole Meldrum and Z. Jolley, is searching and seizing the plaintiff's legal mail with deliberate decisions that deprived the plaintiff of property ^{without a search warrant or inventory list being served,} were done without cause and in a way that was not typical of prison life at the jail and constituted unreasonable search and seizure in violation of the Fourth Amendment of the U.S. Constitution as well as the Fourteenth, Fifth and Thirteenth Amendments of the U.S. Constitution. Plaintiff realleges and incorporates paragraphs 1-7 of "iv. FACTS" and COUNT SEVEN of "v. VIOLATIONS SUPPORTING CLAIM. While the plaintiff is and was a pretrial detainee.

COUNT EIGHT

The actions of the defendants, Cole Meldrum, K. Baer and F. Sullivan, is searching and seizing all of the plaintiff's property with deliberate decisions that deprived the plaintiff of property and liberty, were done in a way that was not typical of prison life at the jail, nor was a list of inventory served to the plaintiff, no search warrant was issued and the plaintiff is missing property that was seized, all the while the plaintiff is and was a pretrial detainee and constituted unreasonable search and seizure in violation of the Fourth Amendment of the U.S. Constitution as well as the Fourteenth, Fifth and Thirteenth Amendments of the U.S. Constitution. Plaintiff realleges and incorporates paragraphs 1-7 of "iv. FACTS" and COUNT EIGHT of "v. VIOLATIONS SUPPORTING CLAIM.

COUNT NINE

The actions of the defendants, Cole Meldrum, K. Baer and F. Sullivan, is denying the plaintiff access to the courts, and confiscating all of the plaintiff's legal work and books, were done sadistically and maliciously and constituted right to freedom of speech, right to counsel, involuntary servitude and due process in violation of the First, Sixth, Thirteenth and Fourteenth Amendments

VII. CLAIMS FOR RELIEF (PAGE 2)

of the US Constitution. The plaintiff realleges and incorporates paragraphs 1-7 of "IV. FACTS" and COUNT NINE of "V. VIOLATIONS SUPPORTING CLAIM".

COUNT TEN

The actions of the defendants, Cole Meldrum, J. Schow and Sgt. Meldrum, is denying the plaintiff access to mail, and failing to offer the plaintiff procedural due process, or any notice or explanation to the correspondant or the recipient for stopped or returned mail, were done sadistically and maliciously and constituted freedom of expression, due process and involuntary servitude in violation of the First, Fourteenth and Thirteenth Amendments of the U.S. Constitution. The plaintiff realleges and incorporates paragraphs 1-7 of "IV. FACTS" and COUNT TEN of "V. VIOLATIONS SUPPORTING CLAIM".

VIII. RELIEF REQUESTED

WHEREFORE, Plaintiff requests that the Court grant the following relief,

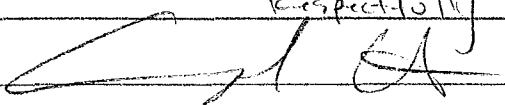
A. issue a declaratory judgment stating that:

1. The actions of the defendants violated the plaintiff's rights of the US Constitution with respect to each count and the rights that were violated.

B. Grant such other relief as it may appear plaintiff is entitled.

20, December, 2021

Respectfully submitted,



ANGEL ABBRU